ORIGINAL

JOHNSON UTILITIES COMP
5230 East Shea Boulevard * Scottsdale, Arizona
PH: (480) 998-3300; FAX: (480) 483-7908

0000085661

SW

Arizona Corporation Commission
DOCKETED
JUN 13 2008
DOCKETED BY

June 12, 2008

Ernest Johnson, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

RE: Johnson Utilities Company, H20, Diversified Water Utilities,
Queen Creek Water Company: Compliance with Decision No. 65840
Notice of Violation from ADEQ dated June 5, 2008
WS-02987A-99-0583; WS-02987A-00-0618; W-02234A-00-0371; W-02859A-00-0774;
W-01395A-00-0784

Dear Mr. Johnson:

On June 6, 2008, I received an email with an attached letter from the Arizona Department of Environmental Quality ("ADEQ") dated June 5, 2008, regarding a spill inspection of the Pecan Water Reclamation Plant. A hard copy of the letter was received by mail on June 10, 2008. A copy of the letter and Notice of Violation ("NOV") dated June 5, 2008, is attached hereto as Attachment 1. Currently we are preparing our response to ADEQ and will copy you as required in the Decision.

Should you have any questions regarding this event or would like any additional information prior to receiving our response, please do not hesitate to contact me. Thank you for your time and consideration in this matter.

Sincerely,

Brian P. Tompsett
Johnson Utilities, LLC

Cc: Docket Control
Steve Olea, Assistant Director
Brian Bozzo, Compliance Manager

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Attachment 1

Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov

Stephen A. Owens
Director

June 5, 2008

Brian Tompsett, Vice President
Johnson Utilities Inc.
5230 E. Shea Blvd., Suite 200
Scottsdale, AZ 85254

Re: **Spill Inspection of the Pecan Water Reclamation Plant (WRP), Inventory No. 105324, Place ID 18583, APP No. P105324, AZPDES Permit AZ0025445, Type 2 Reclaimed Water General Permit No. R105491, Middle Gila River Watershed, Inspection ID No. 121176, Case No. 97512**

Dear Mr. Tompsett:

Enclosed is a Notice of Violation ("NOV") and inspection report prepared by William J. Hare concerning the spill complaint inspection conducted at the site on May 20, 2008. The NOV is being issued for two sanitary sewer overflows that occurred during the weekend of May 17-18, 2008 causing the discharge of an estimated 10,000 gallons of sewage into Queen Creek.

The attached Notice of Violation ("NOV") is an informal compliance assurance tool used by the Arizona Department of Environmental Quality ("ADEQ") to put a responsible party (such as a facility owner or operator) on notice that the Department believes a violation of an environmental requirement has occurred. It describes the facts known to ADEQ at the time of issuance and cites the requirement that ADEQ believes the party has violated.

Although ADEQ has the authority to issue appealable administrative orders compelling compliance, an NOV has no such force or effect. Rather, an NOV provides the responsible party an opportunity to do any of the following before ADEQ takes formal enforcement action: (1) meet with ADEQ and discuss the facts surrounding the violation, (2) demonstrate to ADEQ that no violation has occurred, or (3) document that the violation has been corrected.

ADEQ reserves the right to take a formal enforcement action, such as issuing an administrative order or filing a civil lawsuit, regardless of whether the Department has issued an NOV. Neither ADEQ's issuance of an NOV nor its failure to do so precludes the Department from pursuing these remedies. However, the timeliness of a complete response to this notice will be considered by ADEQ in determining if and how to pursue such remedies.

If you have any questions, regarding the above, please contact William J. Hare at (602) 771-4838.

Sincerely,

John Gibbons, Manager
Water Quality Field Services Unit

cc: Pinal County Health Department
Facility File, Inventory No. 105324
WQFSU Reading File

WJH:wjh: O&M2CLIR.LET

Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street Phoenix, Arizona 85007
(602) 771-2300 www.azdeq.gov

Stephen A. Owens
Director

CERTIFIED MAIL
Return Receipt Requested

Case ID #: 97512

June 5, 2008

Johnson Utilities, LLC
Attention: Brian Tompsett
5230 E Shea Blvd
Scottsdale, AZ 85254-5750

Subject: Pecan Water Reclamation Plant, Place ID 18583
28539 N Gantzel Rd / Queen Creek, AZ 85242

NOTICE OF VIOLATION

The Arizona Department of Environmental Quality (ADEQ) has reason to believe that Johnson Utilities, LLC as the owner/operator of Pecan Water Reclamation Plant has violated a requirement of the Arizona Revised Statutes (A.R.S.), a rule within the Arizona Administrative Code (A.A.C.), or an applicable permit/license, administrative order or civil judgment. ADEQ discovered the violations alleged below during an inspection completed on May 20, 2008.

I. LEGAL AUTHORITY and NATURE OF ALLEGED SIGNIFICANT VIOLATION(S)

1. **A.R.S. § 49-255.01(A)**

   Addition of a pollutant to navigable waters from a point source without a permit.

   During the weekend of May 17 and 18, 2008 the Pecan Water Reclamation Plant (WRP) had two sanitary sewer overflows (SSOs) with a combined estimate of 10,000 gallons or more of untreated raw sewage through a spillway into Queen Creek.

2. **A.R.S. § 49-241(A)**

   Discharge without an Aquifer Protection Permit.

   During the weekend of May 17 and 18, 2008 the Pecan WRP had two SSOs with a combined estimate of 10,000 gallons or more of untreated raw sewage discharged into Queen Creek.

3. **A.A.C. R18-11-109(A)**

   Violation of the numeric surface water quality standard for E. coli.

   During the weekend of May 17 and 18, 2008 the Pecan WRP had two SSOs that discharged raw sewage to a body of standing water in Queen Creek. Sampling of the standing water by ADEQ revealed levels of E. coli at >1600 c.f.u./100ml. The single sample maximum numeric surface water quality standards for E. coli are 235 c.f.u./100ml for full body contact and 576 c.f.u./100ml for partial body contact.

II. LEGAL AUTHORITY and NATURE OF OTHER ALLEGED VIOLATION(S)

1. **Permit 41570 - P1053285, Section 2.6.5.3**

   Failure to notify ADEQ within 24 hours of a discharge of a non-hazardous material which a) has the potential to cause an AQL exceedance, or b) could pose an endangerment to public health or the environment.

   Johnson Utilities failed to notify ADEQ within 24 hours after a discharge of raw sewage from the Pecan WRP to Queen Creek of approximately 6,000 gallons on May 17, 2008. ADEQ was notified of the discharge by e-mails from local residents. Johnson Utilities staff confirmed the discharge on May 19, 2008, after receiving an e-mail inquiry from ADEQ staff.

2. **Permit 41570 - P105324, Section 2.2.1**

   Failure to comply with an engineering design report approved by ADEQ and incorporated by reference in the aquifer protection permit.

   The lift station at the Pecan WRP was approved by ADEQ under file number 2004-0214 with plans submitted on February 14, 2004. The referenced "as builts" describe the installation of two 75 HP Aurora Pumps (or equivalent) capacity. Johnson Utilities officials verbally reported that 35 HP Flygt pumps were operational in the liftstation at the time of the May 17 and 18, 2008 SSOs. Johnson Utilities officials reported that one of the 35 HP Flygt pumps was replaced with a 47 HP Flygt Pump after the May 17 and 18, 2008 SSO events. JU officials advised that the liftstation had originally been equipped with two 20 or 25 HP Aurora pumps that were upgraded about two years ago with 35 HP Flygt Pumps.

3. **Permit 37536 - AZ0025445, Part II, Section C**

   Failure to orally report to ADEQ within 24 hours noncompliance that may endanger the environment or human health.

   Johnson Utilities failed to orally report to ADEQ within 24 hours after a discharge of raw sewage from the Pecan WRP to Queen Creek of approximately 6,000 gallons on May 17, 2008. ADEQ was notified of the discharge by e-mails from local residents. Johnson Utilities staff confirmed the discharge on May 19, 2008, after receiving an e-mail inquiry from ADEQ staff.

III. DOCUMENTING COMPLIANCE

1. Within 7 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or commence twice weekly sampling of the standing water in Queen Creek at the discharge site for E coli and continue twice weekly sampling until at least two consecutive samples taken at least 24 hours apart are below the Surface Water Quality Standard for Partial Body Contact for E coli. The results of each sampling event must be forwarded to ADEQ within 24 hours of receipt from an Arizona state certified laboratory. During the period of twice weekly sampling pursuant to this Compliance Condition, maintain or replace the signs posted pursuant to ADEQ's letter to Johnson Utilities dated May 22, 2008 so they are visible to the public at access points to the standing water in Queen Creek.

2. Within 14 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a list of all sanitary sewer overflows (SSOs) that occurred since January 1, 2007 related to the Pecan Water Reclamation Plant (WRP) or sewer collection systems that flow into the Pecan WRP. For each SSO, provide detail regarding the volume of the discharge, the method of calculating the volume, the location of the discharge, the actions taken by Johnson Utilities to address the discharge and the cause of the discharge.
3. Within 14 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or a report for each sanitary sewer overflow that occurred on May 17 and 18, 2008. Each report should include the following information: date, time (beginning and end) and location of the SSO; how and when Johnson Utilities became aware of the SSO; estimated quantity discharged; method of estimating the quantity; volume and method of recovery; method, location and quantity of disinfection products used; any human exposure to discharged materials; and cause of SSO.
4. Within 30 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or written verification with photos that the liftstation has been upgraded with two pumps of at least 75 horsepower as described in APP P-105324 and as built drawings submitted as part of the permit.

IV. SUBMITTING COMPLIANCE DOCUMENTATION

Please send all compliance documentation and any other written correspondence regarding this Notice to ADEQ at the following address:

Arizona Department of Environmental Quality, Attention: William J. (Bill) Hare, Water Quality Field Service Compliance Unit, 1110 W Washington St, Phoenix, AZ 85007 MC: 5415B-1

V. STATEMENT OF CONSEQUENCES

Significant Violations

1. The time frames within this Notice for achieving and documenting compliance for the violation(s) alleged in Section I of this Notice are firm limits. Failure to achieve or document compliance for the violation(s) alleged in Section I of this Notice within the time frames established in this Notice will result in an administrative compliance order or civil action requiring compliance within a reasonable time frame, substantial civil penalties, and/or the suspension or revocation of an applicable permit/license. ADEQ will agree to extend the time frames for achieving and documenting compliance for the violation(s) alleged in Section I of this Notice only in a compliance schedule negotiated in the context of an administrative consent order or civil consent judgment.

2. Achieving compliance does not preclude ADEQ from seeking civil penalties, and/or suspending or revoking an applicable permit/license for the violation(s) alleged in Section I of this Notice as allowed by law.

Other Violations

3. ADEQ may take any enforcement action authorized by law for the violation(s) alleged in Section II of this Notice, if the violation(s) are not corrected, or if ADEQ determines that the violation(s) have not been corrected in the time frames within this Notice.

VI. OFFER TO MEET

ADEQ is willing to meet regarding this Notice. To obtain additional information about this Notice or to schedule a meeting to discuss this Notice, please contact William J. (Bill) Hare at (602) 771-4838.

John T. Gibbons, Manager
Water Quality Field Service Compliance Unit

William J. (Bill) Hare
Water Quality Field Service Compliance Unit

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER QUALITY DIVISION - WATER QUALITY COMPLIANCE SECTION
Field Services Unit

INSPECTION - WASTEWATER

Facility: Pecan Ranch WRP

Inventory No: 105324

Aquifer Protection Permit (APP) No: P105324

AZPDES Permit No: AZ0025445

Reuse Permit No: R105491

Place ID: 18583

Inspected by: William J. Hare, E.P.S.

Inspection Date: May 20, 2008

Accompanied by: Rob Spencer – Operator
Gary Larsen- General Manager
Brian McNamara – local resident

Report Date: June 5, 2008

	YES	NO	N/A	UNKNOWN
1. WRP quality meets the following permit requirements:				
A. Aquifer Protection Permit		X*		
B. Reuse Permit	X			
C. AZPDES Permit		X*		
2. A certified operator is employed by the owner per ADEQ regulations.	X			
3. This system meets ADEQ requirements for operation and maintenance as noted in the APP		X*		

*The inspection only focused on sanitary flow overflows (SSOs) that occurred on May 17 and May 18, 2008 and caused the discharge of an estimated 10,000 gallons or more of untreated sewage into Queen Creek.

Facility Description:

The Pecan Water Reclamation Plant (WRP) has the capacity to collect and treat a maximum average monthly flow of 2.0 million gallons per day (MGD). The WRP will be constructed in four phases. Each phase is designed to treat 1.0 MGD. The facility is partially built and currently in Phase II, which is 2.0 MGD. The 2.0 MGD of raw wastewater enters the influent lift station, and is pumped to the headworks with barscreen, where it is diverted to each of the four treatment trains. Each treatment train process consists of extended aeration with nitrification-denitrification, clarifiers, filters, ultraviolet (UV) disinfection, sludge digesters, sludge dewatering belt filter press, and an effluent pump station. Chlorine disinfection may also be used

as a back-up. All the WRP units are constructed of either reinforced concrete or steel. All the odor and noise producing units which include the influent pump station, headworks, the extended aeration process including the blower room, and the sludge dewatering belt filter press are enclosed inside a metal building with odor control scrubbers installed on all vents. The entire WRP is surrounded by an aesthetic, 6 foot tall, chain link or concrete block wall fence. Effluent will be disposed via reuse and effluent disposal to the subsurface using a combination of a subsurface leach disposal facility, vadose zone recharge wells, and aquifer injection recharge wells. No discharge to the recharge basins is permitted under this permit. The sludge, including the screenings, grit, and scum, is hauled off site for disposal at a landfill. Depth to groundwater at the WRP site is approximately 377 feet below land surface and the direction of groundwater flow is to the northwest.

INSPECTION PURPOSE AND SCOPE

The purpose of the site visit was to determine the cause(s) for SSOs that occurred on May 17-18, 2008 resulting in the discharge of about 10,000 gallons of untreated sewage into Queen Creek Wash. It should be noted that the construction of a leach field for effluent disposal in Queen Creek pursuant to AZ0025445 and P105324 had not been completed.

Summary of Field Observations:

The following comments are based on observations made by WQFSU staff during the inspection and information furnished by Johnson Utilities officials:

Background Information

During the weekend of May 17-18, 2008 the liftstation that includes the main influent pumps for the Pecan WRP failed on two occasions causing two SSOs into Queen Creek. On both occasions the liftstation was hydraulically overloaded from peak flows after one of the two submersible grinder pumps became inoperative due to debris. Several local residents witnessed the spill from a manhole located upgradient from the sewer plant and near Queen Creek.

Summary of Inspection:

The following are facts imparted by Johnson Utilities officials and local residents regarding the details of the SSO:

- JU officials advised that the liftstation located at the Pecan WRP experienced pump problems resulting in an SSO from a manhole located directed upgradient from the plant.
- The cause was the SSO was related to the failure of one of the two submersible grinder pumps in the liftstation at the WRP. This failure was due to foreign debris in the grinder mechanism. During peak flows, both pumps are necessary to prevent SSOs. The liftstation requires both grinder pumps during peak flows and hence has no backup pumps.

- According to JU officials the liftstation contains two 35 HP submersible Flygt Pumps. Each Flygt Pump was purported to have a pumping capacity of up to 700 gallons per minute. Peak flows reached 1.6 MGD (>1,000 gallons per minute and possible as high as 2,000 gallons per minute) on the day of the spill.
- JU officials advised that about 85% of the 1.6 MGD flow into the Pecan WRP is located upgradient from the plant and flows through the sewer line located on the manhole where the SSO occurred.
- The first SSO occurred on May 17, 2007 at about 7:00pm -9:00pm from a manhole located near the intersection of Kelly Lane and Harold Drive. According to local residents, the hydraulic force of the wastewater lifted the manhole 2 inches off of the casing thereby releasing several thousand gallons of raw sewage onto a spillway that flows to Queen Creek. The flow occurred for about two hours until JU officials were able to remedy the pump failure.
- The second SSO occurred on May 18, 2008 and commenced at about 11:00am and lasted for at least one hour. The witness observed the beginning the spill but departed the residence after one hour and did not note the end of the spill. This SSO occurred from the same manhole located at the intersection of Kelly Lane and Harold Drive. According to a local resident who witnessed the spill, the manhole cover was again lifted up to 2 inches off the casing thereby releasing an estimated several thousand gallons of raw sewage onto a spillway that flows to Queen Creek.
- The pump failure caused the collection sytem to 'backup' and exceeded the hydraulic capacity of the collection system.
- A local resident also observed some sewage being discharged from the 'pic hole' in a manhole cover located at the intersection of Amy Road and Kelly Circle. This SSO was relatively small and did not reach Queen Creek.
- The liftstation is currently not wired with SCADA (Supervisory Control and Data Acquisition) that would allow for remote notification of a high water alarm. The Pecan WRP is in the process of being wired for a telephone system by the local provider, Qwest.
- The existence of high power lines in the area of the Pecan WRP impedes the transmission of an alarm system via microwave signals and hence a 'hard wired' SCADA system is necessitated.
- The work crew 'flushed' the spillway near the spill site with potable water and removed the solids and standing water from the spillway and weir.

The following observations were made during a site visit to Queen Creek.

- The spill occurred from a manhole located just north of the Pecan WRP and on the north side of the wash. The SSO flowed from the manhole into a nearby spillway to the wash. There were some HTH chlorine granules on the spillway that were applied at the time of the cleanup.
- The impacted manhole was located in a residential setting close to several homes.
- There were small traces of toilet paper and other debris from the top of the spillway near the impacted manhole to Queen Creek. The spillway was mostly concrete leading to the wash. It appeared from the inspection that most of the wastewater flowed via gravity thorough weir located at the bottom of the wash and into the wash.

- The weir vault contained sewage solids and the stench of sewage was evident. The weir appeared to function as a clarifier or septic tank during the spill and collected the solids. Wastewater from the weir spilled onto the wash bottom and via gravity to the standing water area located about 30 -40 yards to the east.
- There was some standing water in Queen Creek, located about 30-40 yards upgradient from the referenced spillway. This 'lake' or standing water within the wash was noted during previous inspections. This area of the wash is lower in elevation and generally has some standing water from previous rain events that occurred the past winter or from irrigation runoff. It could not be determined what percentage of the standing water originated from the spill. JU officials advised that only a very small portion of the spill actually flowed to the east and reached the water surface of the wash. However, most of the spill did reach the dry wash area.
- The surface acreage of standing water within the wash was estimated at about 6 acres, with a depth of 3-5 feet deep. There was an estimated 8 million gallons (24-25 acre feet)

of water within Queen Creek. The standing water within the acreage was not flowing to the west and appeared more like a lake within the wash.

Spill Estimates:

- A local resident witnessed both spills and described details about the manhole cover being lifted (floating on the wastewater surge) about 2 inches from hydraulic surging. The SSOs occurred for 1-2½ hours from the manhole near his residence that flows into Queen Creek. The resident advised that the hydraulic force of the spill had removed the manhole cover allowing sewage to flow into Queen Creek via the previously described spillway.
- A resident estimated the flow as high as 300 gallons per minute at peak times of the spill. The same resident estimated the spill to be near 19,000 gallons for both spills.
- The first spill is estimated to be *at least 6,000 gallons* based on a flow of an average of 50 gallons per minute for 2 ½ hours (150 minutes) from the manhole into Queen Creek. According to JU employee Rob Spencer, peak flows to the lift station reached 1,500 – 2,000 gallons per minute with only one pump operational which had the capacity to pump 700 gallons per minute.
- The second spill is estimated to be *at least 4,000 gallons* based on the fact that a witness (local resident) reported the manhole cover to elevate for at least one hour.
- JU officials estimated the each spill at 2,500 gallons per each day. This estimate appears low based on the observations made by residents and the fact that the 100 + pound manhole cover was 'lifted off' of the casing from the hydraulic surge of wastewater at the time of the SSO.

Notification of spill:

ADEQ was notified of the spills via email from local residents on Sunday, May 18, 2008. JU officials notified ADEQ of the spill via voice mail during the early morning hours of Monday, May 19, 2008, after ADEQ sent an email to JU during the early morning hours. The following is a short summary of some of the notifications ADEQ received from local residents:

- Local resident from Queen Creek notifies ADEQ via email at 6:23pm on Sunday, May 18, 2008;
- Local resident leaves phone message on Sunday, May 18, 2008 regarding the SSO in Queen Creek;
- E-mail complaint filed on Sunday, May 18, 2008 regarding the SSO into Queen Creek;
- In the days/weeks after the spill, ADEQ has received numerous phone and email complaints about the sewage spill.

JU subsequently sent a written report that provided some additional detail about the spill some of which is noted below:

- JU estimates the spill at 2,500 gallons per each SSO;
- JU alleges that 'some' of the SSO was recovered;
- JU notes in the written report that the spill 'traveled through a concrete spillway into a pipe and weir adjacent to the Queen Creek wash.

A review of the written spill report submitted by JU revealed some deficiencies as noted below:

- The report does not note methods used by JU to calculate the amount of sewage spilled;
- The spill estimates appeared too low based on observations by the nearby residents;
- There was no mention of how much sewage was recovered;
- The referenced report notes that the sewage traveled to a weir adjacent to the wash, when in fact the weir was "in the wash."

Sampling Event

The inspection included a sampling event of the standing water within Queen Creek. Samples were obtained from the shoreline of both the north and south sides of the creek. Samples were submitted to the Test America Laboratory in Tempe for Fecal Coliform, E. coli, TKN, ammonia and Nitrates/Nitrites.

The sampling results for Fecal Coliform and E. Coli were reported by Test America to have a result of > 1,600 c.f.u./100ml. This is for both E. Coli and Fecal Coliform and for both the north and south sides of Queen Creek.

The results for Nitrate/Nitrite and ammonia revealed low results for these constituents. The sample taken on the south side of Queen Creek revealed ammonia at 2.8 mg/L and Nitrate at 0.38 mg/L. The north side revealed ammonia levels as non detect and nitrate at 0.39 mg/L.

Construction approvals for the liftstation at the Pecan WRP Construction File No. 2004-0214

The liftstation at the Pecan WRP was approved by ADEQ under file number 2004-0214 with plans submitted on February 14, 2004. The ADEQ discharge authorization required the use of 75

HP Aurora pumps. The referenced 'as builts' submitted by JU indicated the installation of two 75HP Aurora Pumps (or equivalent) capacity. JU officials have verbally reported that 35 HP Flygt pumps were installed in the liftstation at the time of the liftstation failure. JU officials replaced one of the 35 HP Flygt pumps with a 47 HP Flygt Pump several days after the SSO.

JU officials (Gary Larsen) later advised that the liftstation originally was equipped with two 20 or 25 HP Aurora pumps, which were upgraded to the 35 HP Flygt pumps about two years ago.

Findings:
The inspection noted that two SSOs occurred during the weekend of May 17-18, 2008 from a manhole located near Queen Creek, just upgradient from the Pecan WRP liftstation resulting in the discharge of an estimated 10,000 gallons of sewage into Queen Creek. The amount of sewage that reached the 'lake' of surface water within Queen Creek is not known. However, JU officials acknowledge that a small, unknown percentage of the spill did reach the standing surface water within the creek. The facility responded in quick time to the spill. However, the liftstation appears to be hydraulically overloaded during peak flows with undersized pumps. This is an ongoing problem that occurred on at least one prior occasion, December 24, 2007.

Recommendations:

1. Upgrade the liftstation with larger grinder pumps as required in the Discharge Authorization to accommodate peak flows.
2. Complete the installation of a SCADA system at the liftstation for high water alarms and pump failure.

Compliance Summary

1A. Aquifer Protection Permit (APP). The facility experienced two SSOs on May 17-18, 2008 resulting in the unpermitted discharge of about 10,000 gallons of untreated sewage into Queen Creek. **Rating: Non Compliance**
1B Reuse Permit – N/A
1C. AZPDES Permit. The facility experienced two SSOs on May 17-18, 2008 resulting in the unpermitted discharge of about 8,000 gallons of untreated sewage into Queen Creek.
Rating: Non Compliance

2. **Operator Certification Requirements.** This facility is rated as a Grade 3 WWT and a Grade 2 WWC wastewater treatment facility. Rod Spencer is the operator who is certified by ADEQ as a Grade 4 WWT and a Grade 2 WWC.
Rating: Compliance

3. **Operation & Maintenance (O&M) Requirements.** The inspection noted that the liftstation appears to be hydraulically overloaded during peak flows. In addition, the pumps installed within the liftstation were not the same pumps as noted in 'as builts' for the 4.01 General Permit which states that 75HP pumps were installed. The smaller pumps (35 HP Flygt pumps) appear to have been a contributing factor in the SSO. **Rating: Non Compliance**
END OF REPORT